

MARK E. FERRARIO (Nevada Bar No. 1625)  
TAMI D. COWDEN (Nevada Bar No. 8994)  
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*Attorneys for SHAC, LLC dba Sapphire Gentlemen's Club,  
SHAC MT, LLC, David Michael Talla, and Peter Feinstein*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

CORISSA JONES, on behalf of herself and on  
behalf of all others similarly situated,

Plaintiffs,

vs.

SHAC, LLC D/B/A SHAPPHIRE [*sic*]  
GENTLEMEN'S CLUB; SHAC MT, LLC;  
DAVID MICHAEL TALLA and PETER  
FEINSTEIN,

Defendants.

SHAC, LLC,

Counterclaimant,

CORISSA JONES, and all others similarly  
situated who opt into this litigation,

Counterdefendants.

Case No. 2:15-cv01382-RFB-CWH

**STIPULATION AND [PROPOSED]  
ORDER REGARDING DEADLINE  
TO OPPOSE MOTIONS FOR  
SUMMARY JUDGMENT  
(THIRD REQUEST)  
AND JOINT PRETRIAL STATEMENT  
(SECOND REQUEST)**

IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiffs/Counter-  
Defendants, including Corissa Jones and all Plaintiffs who opted into the instant action ("Class  
Plaintiffs"), by and through their counsel of record, the law firm of Kennedy Hodges LLP, and  
Defendants/Counter-claimants SHAC, LLC, SHAC, MT, LLC, David Michael Talla and Peter  
Feinstein ("SHAC"), by and through their counsel of record, the law firm of Greenberg Traurig, LLP,

as follows:

1. On February 4, 2019, Plaintiffs filed three voluminous partial motions for summary judgment, Docs. 189, 190 and 191;
2. The deadline for Defendants to respond was extended to March 7, 2019 (ECF 198), and thereafter to March 14, 2019 (ECF 201);
3. However, Defendants requested, and Plaintiffs agreed to an additional extension of time;
4. Defendants' counsel submits that an unexpected personal issue has come up, necessitating the request;
5. Accordingly, the parties stipulate that Defendants will file oppositions to the pending partial motions for summary judgment by March 19, 2019 and Plaintiffs shall have up to April 2, 2019 to file their replies.
6. The parties further stipulate to extend the deadline to submit the Joint Pretrial Statement ("JPS"). Given the status of pending motions before the Court, the parties ask that the deadline to submit the JPS be set 30 days after a decision on Plaintiffs' motions for partial summary judgment. Alternatively, the parties request a 30 days extension of time.

**IT IS SO STIPULATED.**

DATED this 14<sup>th</sup> day of March, 2019

DATED this 14<sup>th</sup> day of March, 2019.

GREENBERG TRAURIG, LLP

KENNEDY HODGES LLP

By: /s/ Alayne Opie

By: /s/ Carl Fitz

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Houston, TX 77006  
*Counsel for Plaintiffs*

**IT IS SO ORDERED** this 15<sup>th</sup> day of March, 2019.

  
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RICHARD F. BOULWARE, II  
UNITED STATES DISTRICT JUDGE